

EXHIBIT A

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	Criminal No. 24-CR-10035-JEK
)	
(1) HAN LEE, a/k/a “Hana”,)	
)	
Defendant.)	

**DECLARATION OF SPECIAL AGENT ZACHARY MITLITSKY IN SUPPORT OF
GOVERNMENT'S MOTION FOR FORFEITURE (MONEY JUDGMENT)**

Pursuant to 28 U.S.C. § 1746 and Local Rule 7.1, I, Zachary Mitlitsky, a Special Agent with Homeland Security Investigations ("HSI"), under penalty of perjury states as follows:

1. I am a Special Agent with United States Department of Homeland Security (“DHS”), Homeland Security Investigations (“HSI”) and have been so employed since August 2020. I am currently assigned to the Office of the Special Agent in Charge (SAC), Boston, Massachusetts. I am authorized to investigate crimes involving violations of Title 8, Title 18, and Title 19 of the United States Code (“USC”). I am a graduate of the Federal Law Enforcement Training Center (“FLETC”) in Glynco, Georgia, where I received training to become a Special Agent; specifically, I have received certifications from the Criminal Investigator Training Program in February 2021 and from the HSI Special Agent Training Program in May 2021. I am currently assigned to the Human Smuggling and Trafficking Unit, where I facilitate interstate and international human trafficking investigations. Prior to my tenure as a Special Agent, I served as a Uniformed Division Officer with the United States Secret Service.

2. I am submitting this declaration in support of the United States' Motion for Order of Forfeiture (Money Judgment). The information contained in the declaration is based

upon my personal involvement in the investigation, including my review of pertinent documents (including documents obtained pursuant to subpoenas and search warrants), information obtained through interviews, information obtained through search warrants, and my training and experience.

3. On September 27, 2024, Han Lee pleaded guilty before the United States District Court for District of Massachusetts to one count of Conspiracy to Persuade, Induce, Entice, and Coerce One or More Individuals to Travel in Interstate or Foreign Commerce to Engage in Prostitution in violation of 18 U.S.C. § 371, and one count of Money Laundering Conspiracy in violation of 18 USC § 1956(h). *See* Docket No. 112.

4. Han Lee and her co-conspirators were members of an interstate prostitution network that operated along the east coast of the United States. Han Lee was the leader and supervisor of the prostitution network. Specifically, the Indictment alleged that at least from in or about July 2020 through in or about November 8, 2023, Han Lee was the leader, manager and operator of an interstate prostitution network with multiple brothels in greater Boston and eastern Virginia. In that capacity, among other things, Han Lee communicated with and recruited and enticed women to travel interstate and engage in commercial sex for cash in Boston and eastern Virginia; she posted the women's photographs on websites that served as advertisements for the commercial sex services; she determined the rates of each commercial sex date; she determined the percentage of proceeds that would be paid to the women for commercial sex dates; she directed the women as to where to place their earnings (in the freezer) for later collection by her, by her employee Junmyung Lee, or by other co-conspirators as yet to be identified; she maintained the websites and business records associated with her organization; she maintained the brothel units (both in Massachusetts and in her regular travels to Virginia) and has been seen picking up and dropping off females,

dropping off supplies, paying for the rent and utilities, and entering and exiting the units regularly; she concealed millions of dollars in prostitution proceeds by purchasing structured money orders, sending money overseas, using the money to pay for business expenses, making cash deposits into known U.S. bank accounts of hers and third parties, and engaging in various bank and peer-to-peer (P2P) account transfers; she maintained brothel cell phones and arranged appointments for the sex buyers and commercial sex workers; she enlisted James Lee to rent apartments in his true and fraudulent identities used for the prostitution business and field calls from apartment management to protect her business; she enlisted Junmyung Lee to rent apartments used for the prostitution business and to serve as the booker to manage and book appointments and screen prospective sex buyers; she paid for plane tickets for James Lee to travel to Boston and eastern Virginia to lease these apartments; and, she paid for air travel and rideshares for the commercial sex workers who traveled to Boston and eastern Virginia. Han Lee and her co-conspirators advertised their prostitution network primarily on two websites: www.bostontopten10.com and www.browneyesgirlsva.blog. Both websites advertised appointments with women in either greater Boston (www.bostontopten10.com) or eastern Virginia (www.browneyesgirlsva.blog). *See* Docket No. 41.

5. On November 8, 2023, law enforcement executed several search, seizure and arrest warrants in multiple jurisdictions on Han Lee and her co-conspirators, as well as on property that constituted, or was derived from proceeds traceable to, or was involved in, the offenses described in the Indictment. The properties seized that constituted, or were derived from proceeds traceable to, or were involved in, the offenses described in the Indictment are listed in the forfeiture allegations of the Indictment.

6. As part of the evidence seized on November 8, 2023, law enforcement obtained handwritten ledgers authored by Han Lee and Junmyung Lee involved in the “booking” of

commercial sex dates. The ledgers contained explicit details concerning the length of time, location, and specific sex acts being booked by sex buyers. In addition to the ledgers seized, agents also reviewed “menus” from cellular devices of interviewed sex buyers which listed specific prices for each commercial sex act, based on the sex act itself and the length of time for the respective sex act. As stated in my prior affidavits filed in this case, each website frequently updated advertisements of women available in Massachusetts and Virginia. I am aware that interested sex buyers communicated directly with the brothel phones provided on or associated with each of the websites in order to book an appointment for commercial sex with an advertised woman. The brothel phones sent commercial sex buyers a “menu” containing the women available, the sexual services available, and the hourly rate. The sex buyer and the user of the brothel phone agreed upon the logistics of the commercial sex services to be provided once all details were confirmed by the prostitution business and the sex buyer. I am aware based on my knowledge of the investigation that once a commercial sex date was confirmed and agreed upon, the brothel appointment “booker” (typically, Junmyung Lee or Han Lee or another co-conspirator) wrote in the appointment book/ledger relevant information, not limited to, the date, time, and type of service for the appointment.

7. Based on my training and experience, I am aware that the prostitution business is a cash business. Whereas it is common for legitimate cash businesses to simply deposit their cash earnings into a bank account, individuals associated with criminal activity often take measures to conceal or disguise the nature, source, location, ownership, or control of their criminal proceeds to avoid detection from law enforcement. Some of the techniques believed to have been utilized by Han Lee and her co-conspirators to conceal and promote the prostitution business include having multiple members of the organization deposit cash proceeds into their own accounts, thereby spreading them out, converting the cash proceeds

into money orders to make the funds appear more legitimate, utilizing third party bank accounts to receive deposits and conduct subsequent financial transactions, co-mingling criminally derived funds in accounts containing other revenue sources, purchasing luxury goods, including bags and shoes, purchasing stored value cards, sending money overseas through multiple layers of transfers, and using the money – in the form of money orders, cash, or other deposits – to pay for various expenses of the prostitution business. In addition, Han Lee also engaged in “structuring” (intentionally splitting larger amounts of money into a series of smaller sums to avoid scrutiny from law enforcement or compliance obligations), both in the manner in which she and co-conspirators made cash deposits into their own accounts, as well as the manner in which they converted cash into money orders, in order to avoid reporting requirements.

8. Due to Han Lee’s and her co-conspirators’ efforts to conceal the cash proceeds of the prostitution business, the meticulously maintained ledgers, or appointment books, in conjunction with the “menus” are the best source for determining the actual proceeds of the business. Because this was a cash business and most of the proceeds Han Lee’s business earned did not travel through traditional traceable banking methods, investigators are unable to completely quantify how much money Han Lee’s prostitution business made over the course of the charged conspiracy. As a result, investigators believe that the best way to determine the total actual gross proceeds would be through a review of Han Lee’s meticulous business records. While the data from the brothel phones did contain conversations that occurred between the appointment booker and the sex buyers, those conversations that occurred on the brothel phones – specifically, the finalized agreements to a date, time, price and service for the commercial sex – were subsequently written into the ledgers, which contained the appointments and the most accurate depiction of the daily brothel schedule.

9. By referencing the ledgers and the “menus,” investigators took a sample of four different one-month time periods: September 2022, December 2022, April 2023, and July 2023. These months represented the most detailed records that were available in the handwritten ledgers. Given that the ledgers were maintained by both Han Lee and Junmyung Lee, and others acting at Han Lee’s direction, they contained a combination of English and Korean writing, depending on who was recording the information at that particular time. Because of the inconsistency in legibility, the language barrier, and the use of coded language, I determined that only a select few months from the recovered ledgers were able to be accurately transcribed into an excel spreadsheet for analysis. Representative pages from the December 2022 ledger are attached hereto as Exhibit 1. Screenshots of sample “menus” for Han Lee’s Virginia and Massachusetts locations listing specific prices for each commercial sex act are attached hereto as Exhibit 2.

10. Menu prices for a specific commercial sex act sometimes varied based on the location, length of time, type of service, and specific commercial sex worker. For each commercial sex act listed on the ledger, I used what I believed to be the most accurate approximation of the average price. Based on the investigation and evidence, I am aware that sex buyers occasionally agreed to non-menu commercial sex acts with the user of the brothel phone. Additionally, based on my review of the ledgers maintained by Han Lee, Junmyung Lee and others, I observed commercial sex dates for lengths of time, like a 45-minute commercial sex date, that were not always listed on the menu. Additionally, at times, I am aware that some commercial sex workers worked in pairs as “Duos,” and prices for commercial sex dates with a “Duo” were also not listed on the sample “menu.” As such, I estimated the approximate value of these commercial sex dates based on the prices for other commercial sex acts similar in length and type of service, to reach a reasonable estimate of

the revenue from these “off-menu” encounters.

11. Using the sample of four different one-month time periods, investigators calculated the approximate monthly gross revenue of the interstate prostitution network, which was \$202,865 per month. Investigators calculated the approximate monthly gross revenue by recording every commercial sex date and referencing the “menus” to establish the approximate price of the date. Investigators then added the total price of all the dates that occurred within that specific month to get the approximate gross revenue for that month. Finally, investigators averaged the four months of data collected to get an approximate monthly gross revenue, which was \$40,573.

12. On November 8, 2023, when Han Lee and her co-conspirators were arrested and search warrants were executed on her brothels and residence, Han Lee was operating six brothel locations in Massachusetts and Virginia. However, the start dates of each brothel location were unique. Between September 2022 and November 8, 2023, Han Lee was operating – on average – five brothel locations at a time.¹ Investigators calculated the number of months each brothel location had been operating, and then multiplied it by the approximate monthly gross revenue. Finally, investigators added the approximate gross revenue of each brothel location together which resulted in an approximate gross revenue of all brothel locations for the time period of the charged conspiracy. This calculation is reflected in Exhibit 3, attached hereto. The total approximate gross revenue for all brothel locations for the period of the conspiracy is \$5,681,572.

13. Finally, investigators subtracted an average of the payments Han Lee made to

¹ I am aware that Han Lee’s prostitution network began a lease in October 2023 for the Tysons, Virginia brothel location. Because this sixth location was only operating for one month prior to the dismantling of her prostitution network, I only included five brothel locations when calculating an approximate monthly gross revenue.

her charged co-conspirators, Junmyung Lee and James Lee, to determine Han Lee's gross proceeds as the organizer, leader and operator of the interstate prostitution network. I am aware from my investigation that Han Lee paid James Lee approximately \$1,000 per month per active lease that he held as a commission for maintaining the leases in his true and fraudulent identities. This yielded a total commission in the amount of approximately \$63,000. Han Lee paid Junmyung Lee approximately \$6,000 to \$8,000 per month, amongst other payments, as an employee of her prostitution network, yielding a total amount paid to Junmyung Lee of approximately \$200,000.

14. Based upon the above, investigators determined that Han Lee's gross proceeds as the organizer, leader and operator of the interstate prostitution network, as described in Counts One and Two of the Indictment, is \$5,418,572.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 6, 2025.

By: *Zachary Mitlitsky*
Zachary Mitlitsky
Special Agent
Homeland Security Investigations

EXHIBIT 1

VA - 474 - 80 > 460

Notes: 12월 15일. 목요일

HOURS	Name Date	Name Date	Name Date	Name Date
	:00	:00	:00	:00
	:30	:30	:30	:30
8	8 :15 :30 :45	8 :15 :30 :45	8 :15 :30 :45	8 :15 :30 :45
9	9 :15 :30 :45	9 :15 :30 :45	9 :15 :30 :45	9 :15 :30 :45
10	10 :15 :30 :45	10 :15 :30 :45	10 :15 :30 :45	10 :15 :30 :45
11	11 :15 :30 :45	11 :15 :30 :45	11 :15 :30 :45	11 :15 :30 :45
12	12 :15 :30 :45	12 :15 :30 :45	12 :15 :30 :45	12 :15 :30 :45
1	1 :15 :30 :45	1 :15 :30 :45	1 :15 :30 :45	1 :15 :30 :45
2	2 :15 :30 :45	2 :15 :30 :45	2 :15 :30 :45	2 :15 :30 :45
3	3 :15 :30 :45	3 :15 :30 :45	3 :15 :30 :45	3 :15 :30 :45
4	4 :15 :30 :45	4 :15 :30 :45	4 :15 :30 :45	4 :15 :30 :45
5	5 :15 :30 :45	5 :15 :30 :45	5 :15 :30 :45	5 :15 :30 :45
6	6 :15 :30 :45	6 :15 :30 :45	6 :15 :30 :45	6 :15 :30 :45
7	7 :15 :30 :45	7 :15 :30 :45	7 :15 :30 :45	7 :15 :30 :45
8	8 :15 :30 :45	8 :15 :30 :45	8 :15 :30 :45	8 :15 :30 :45
	:00 :30	:00 :30	:00 :30	:00 :30

Notes: 12월 16일, 금요일

VA - 3기




- 60 7490

HOURS	Name Date	Name Date	OFF	Name Date	Name Date
	지아 (야자)	3기	OFF	주비	제보
	:00	:00		:00	:00
	:30	:30		:30	:30
8	8	8		8	8
	:15	:15		:15	:15
	:30	:30		:30	:30
	:45	:45		:45	:45
9	⑨ 지아 24 8367	9		⑨ 주비 29 6516	
	:15	:15		:15	:15
	:30	:30		:30	:30
	:45	:45		:45	:45
10	10 60min	10		10 60min	
	:15	:15		:15	:15
	⑩ 지아 52 0093	30		⑩ 주비 58 6404	
	:45	:45		:45	:45
11	11 60min	11		11 60min	
	:15	:15		:15	:15
	:30	:30		:30	:30
	:45	:45		:45	:45
12	12 0515 - 야자 -	12		12 60min	
	:15	:15		:15	:15
	:30	:30		:30	:30
	:45	:45		:45	:45
1	① 지아 42 6223	1		① 주비 68 5282	
	:15	:15		:15	:15
	:30	:30		:30	:30
	:45	:45		:45	:45
2	2 1910	2		2 BB. 60min, 15	
	:15	:15		:15	:15
	:30	:30		:30	:30
	:45	:45		:45	:45
3	3 60min	3		3 60min	
	:15	:15		:15	:15
	:30	:30		:30	:30
	:45	:45		:45	:45
4	④ 지아 28 4691	4		④ 주비 73 6416	
	:15	:15		:15	:15
	:30	:30		:30	:30
	:45	:45		:45	:45
5	5 60min	5		5 30min	
	:15	:15		:15	:15
	:30	:30		:30	:30
	:45	:45		:45	:45
6	⑥ 지아 66 5635	6		⑥ 주비 33 4151	
	:15	:15		:15	:15
	:30	:30		:30	:30
	:45	:45		:45	:45
7	7 60min	7		7 BB. 60min	
	:15	:15		:15	:15
	:30	:30		:30	:30
	:45	:45		:45	:45
8	⑧ 지아 56 6918	8		⑧ 주비 29 0711	
	:15	:15		:15	:15
	:30	:30		:30	:30
	:45	:45		:45	:45
	:00	:00		:00	:00
	:30	:30		:30	:30

Notes:

HOURS	Name Date	Name Date	Name Date	Name Date
	701	CH	301	211
	:00	:00	:00	:00
	:30	:30	:30	:30
8	8	8	8	8
	:15	:15	:15	:15
	:30	:30	:30	:30
	:45	:45	:45	:45
9	9	9	9	9
	:15	:15	:15	:15
	:30	:30	:30	:30
	:45	:45	:45	:45
10	10	10	10	10
	:15	:15	:15	:15
	:30	:30	:30	:30
	:45	:45	:45	:45
11	11	11	11	11
	:15	:15	:15	:15
	:30	:30	:30	:30
	:45	:45	:45	:45
12	12	12	12	12
	:15	:15	:15	:15
	:30	:30	:30	:30
	:45	:45	:45	:45
1	1	1	1	1
	:15	:15	:15	:15
	:30	:30	:30	:30
	:45	:45	:45	:45
2	2	2	2	2
	:15	:15	:15	:15
	:30	:30	:30	:30
	:45	:45	:45	:45
3	3	3	3	3
	:15	:15	:15	:15
	:30	:30	:30	:30
	:45	:45	:45	:45
4	4	4	4	4
	:15	:15	:15	:15
	:30	:30	:30	:30
	:45	:45	:45	:45
5	5	5	5	5
	:15	:15	:15	:15
	:30	:30	:30	:30
	:45	:45	:45	:45
6	6	6	6	6
	:15	:15	:15	:15
	:30	:30	:30	:30
	:45	:45	:45	:45
7	7	7	7	7
	:15	:15	:15	:15
	:30	:30	:30	:30
	:45	:45	:45	:45
8	8	8	8	8
	:15	:15	:15	:15
	:30	:30	:30	:30
	:45	:45	:45	:45
	:00	:00	:00	:00
	:30	:30	:30	:30

EXHIBIT 2A

← Boston To...   

girls
they don't like it!!

GFE Services

30 mins 240

60 mins 340(up
to 2shot)

90 mins 540

120 mins 640

BB Services

(BB = without CD)

BB 30 mins 390


BB 60 mins(1
↓



Text



52% 6:07 PM

← Boston To...   

120 mins 640

BB Services

(BB = without CD)

BB 30 mins 390

BB 60 mins(1


pop) 450

BB 60 mins(2

pops) 540

BB 90 mins 740

BB 120 mins 840

Please  one of
above. Thank you!





  Text  

EXHIBIT 2B

12:12

5G%



+1 (202) [REDACTED]

Only Cream

Gfe Half Hour- 240
BB Half Hour- 390
Gfe Hour for up to 2shots- 320
BB Hour for 1shot- 430
BB Hour for 2shots- 520
Gfe 90minutes- 500
BB 90minutes- 700
Gfe 2Hours- 600
BB 2Hours- 800
Gfe 3Hours- 840
BB 3Hours- 1,040
Gfe 4Hours- 1,120
BB 4Hours- 1,320
Gfe 5Hours- 1,400
BB 5Hours- 1,600

I'll do the bb hour two shots.
Same place by the Barnes and
Noble?

Yes same

11am with Cream BB 1hr 2p_520

2921 District Ave
Fairfax, VA 22031



Text Message



EXHIBIT 3

Calculated estimated brothel revenues

<u>Location</u>	<u>Beg Date</u>	<u>End Date</u>	<u>Months Operating*</u>	<u>Total (based on 4-mo avg)</u>
87 New St, Unit 206, Cambridge	2/20/2018	2/28/2021	36.8	1,493,086
77 New St, Unit 210, Cambridge	5/26/2021	6/27/2022	13.2	536,916
2985 District Ave, Unit 245, Fairfax, VA	7/8/2021	11/7/2023	28.4	1,152,273
90 Fawcett St, Unit 109, Cambridge	1/25/2022	11/7/2023	21.7	880,434
90 Fawscett St, Unit 435, Cambridge	6/26/2022	11/7/2023	16.6	674,864
66 Bond St, Unit 221, Watertown	8/22/2022	11/7/2023	14.7	597,776
90 Fawcett St, Unit 530, Cambridge	4/3/2023	11/7/2023	7.3	294,830
1500 Westbranch Dr, Unit 649, Tysons, VA	9/30/2023	11/7/2023	1.3	51,392
				<u>\$ 5,681,572</u>

	<u>Total</u>	<u>Per Location</u>
Revenues (5 locations) - Sept 2022	\$ 189,110	\$ 37,822
Revenues (5 locations) - Dec 2022	\$ 178,180	\$ 35,636
Revenues (5 locations) - April 2023	\$ 204,220	\$ 40,844
Revenues (5 locations) - July 2023	\$ 239,950	\$ 47,990
average per month (5 locations)	\$ 202,865	\$ 40,573

* The chart shows a column titled "Months Operating," which reflects the number of months (based on a 30 day month) each brothel location was in operation. Investigators relied upon the start and end dates reflected in lease agreements, and other information known to investigators, when arriving at the number of months the location was in operation. The number in the "Months Operating" column was rounded to the nearest one decimal place for the number that appears in this chart for ease of reading this chart. However, the Excel spreadsheet formula used additional decimal places, which are not visible on the chart, when performing its calculation of the "Months Operating" for each brothel location. As such, if one manually (i.e., without using an Excel formula but instead using a calculator) calculates the Total (based on 4-mo avg) for each brothel location by taking the rounded to one decimal place "Months Operating" number and multiplying it by the per location average per month (5 locations) amount of \$40,573, for certain brothel locations, there is a slight discrepancy from the numbers reflected in this chart for the Total (based on 4-mo avg) column.

Upon request, an electronic copy of the actual Excel file can be made available to the Court, Probation and counsel for the Defendant to show the Excel formulas used to arrive at the calculations reflected in each row and column of the spreadsheet.